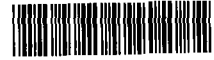




Waukegan Harbor Citizens Advisory Group

**55 Harbor Place - P.O. Box 297
Waukegan, Illinois 60079
Phone 847-244-3133 Fax 847-244-1348**

EPA Region 5 Records Ctr.



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Members

Abbott Laboratories
Akzo Nobel
Alliance of the Great Lakes
Bombardier Recreational Products
Carol Dorge, Attorney
City of North Chicago
City of Waukegan
College of Lake County
Commonwealth Edison
EJ & E Railway
Great Lakes Sport Fishing Council
Illinois Audubon Society
Integrated Lakes Management
Johns Manville
LaFarge Corporation
Lake County Chamber of Commerce
Lake County Department of Planning
Lake County Health Department
Larsen Marine, Inc.
LFR Levine • Fricke
Liberty Prairie Conservancy
Midwest Generation
National Gypsum
North Shore Gas
North Shore Sanitary District
Salmon Unlimited
Sierra Club, Illinois Chapter
Tanner Environmental Company
Waukegan Charter Boat Association
Waukegan Downtown Association
Waukegan Lakefront Development Corp.
Waukegan Park District
Waukegan Port District
Waukegan Yacht Club
Concerned Citizens

Associates

Chicago Metropolitan Agency
for Planning (CMAP)
Delta Institute
Illinois Citizen Action
Illinois Dept. of Natural Resources
Illinois Environ. Protection Agency
Illinois-Indiana Sea Grant
Illinois Lake Management Association
Illinois Pollution Control Board
International Joint Commission
Maritime Administration
U.S. Army Corps of Engineers
U.S. Environ. Protection Agency
U.S. Fish and Wildlife
University of Illinois- Marine Extension
Waukegan Public Library
Concerned Citizens

February 2, 2009

Kevin Adler
Remedial Project Manager
USEPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, Illinois 60604-03590

The majority of the members of the Waukegan Harbor Citizen's Advisory Group support Alternative #2 as the USEPA Cleanup Plan for removing the remaining PCB pollution in the harbor under the Superfund program. We believe there should be no further extensions to "study how to clean the harbor". Far and enough public time, money and effort have been expended to find a suitable solution. All parties have been fully involved in reaching this plan and have had equal access to USEPA, IEPA and USACE administrators overseeing this work.

The Waukegan Harbor CAG has been actively involved in reaching a suitable cleanup plan for the PCB contamination since August of 1990. The original Outboard Marine Corporation cleanup in the mid 1990's cleaned only to the then hazardous waste standards of 50 ppm and was only done in the North Harbor section. The Federal Channel was not cleaned up at that time because the levels of PCB's fell below 50 ppm. Today the required cleanup is 1 ppm or less for PCB's based on human health criteria.

Illinois only has one Area of Concern on the Great Lakes - Waukegan Harbor. The harbor is a Federal Channel used by industry, recreational boaters and the fishing community. A great deal of subsistence fishing utilizing Government Pier takes place at the harbor. It may be assumed that this will increase in the present economy, subjecting even more area citizens of low income to PCB exposure in the fish they eat. Fish consumption is one of the Beneficial Use Impairments of the harbor. Human health impacts are critically important to resolve today for all citizens. We want to be able to delist this advisory by removing the PCB cause of it.

Waukegan Harbor is a Harbor of Refuge for ALL ships on Lake Michigan and has a US Coast Guard station. It is far safer, and more desirable, to provide safe harbor in storms and distress circumstances than to lose lives and clean up spills. The Federally authorized channel, which is maintained by the U. S. Army Corps of Engineers, should be continued with access available to everyone.

Another of the 6 Beneficial Use Impairments for the Waukegan Harbor Area of Concern is a dredging moratorium which will remain in place until the remaining PCB's are cleaned up to 1 ppm or less.

DREDGE

DEEPEN

DELIST



Waukegan Harbor Citizens Advisory Group

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Mr. Kevin Adler
USEPA

February 2, 2009
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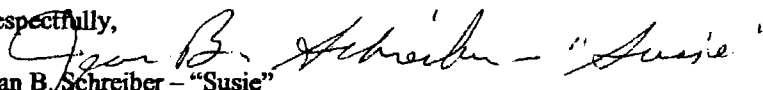
Capping alone will place institutional controls on the harbor. No further disturbance or dredging could be allowed. In effect, it is merely sweeping all of the pollutants under the rug. Capping will restrict future development of the harbor and also prove difficult if any spills should occur. Neither research ships, commercial ships, nor tall ships or cruise ships would be able to use the harbor because of the draft limitations.

Today's economy needs industry and jobs. Waukegan Harbor industry provides the raw material at a very effective cost base for the infrastructure building needs seen across the country today. None of the present industries contributed to the harbor pollution. In fact, they are leaders in trying to assist in removing the pollution.

Cleanup of the remaining PCB's in Waukegan Harbor under Alternative 2 of the USEPA Superfund proposal will NOT in any way detract from the City of Waukegan's Master Plan. In fact, it should considerably enhance the area as they can honestly celebrate a full clean up, something in which future users and residents will all rejoice.

As near-shore residents of Lake Michigan, we have the privilege of living by and enjoying all of the benefits of one of the world's great fresh water reserves. It is also our responsibility to properly care for it in the highest manner possible.

Respectfully,


Jean B. Schreiber - "Susie"
Chair
Waukegan Harbor Citizens' Advisory Group

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